

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Docket No. 5:19-cr-76-4
	)	
WILLIAM STENGER,	)	
Defendant.	)	

**JOINT STIPULATION REGARDING RELEVANT CONDUCT**

The United States of America and William Stenger stipulate and agree that for purposes of Stenger’s sentencing, the Court may rely on the facts alleged in the Government’s Brief Regarding William Stenger’s Relevant Conduct (Doc. 372, the “Brief”), except as described below.

The purpose of the upcoming evidentiary hearing scheduled to begin October 12, 2021 was to allow the Court to resolve disputed facts relating to Stenger’s relevant conduct in connection with his conviction. In light of the agreement reached by the parties, the hearing is no longer necessary. The government does not believe that factual disputes about conduct before 2011 need be resolved by the Court for purposes of Stenger’s sentencing. As a result, the government agrees that sections IV(A) through IV(C) of the Brief do not need to be included in the Presentence Report or be resolved by the Court for purposes of Stenger’s guideline calculation. The government also agrees to adjust the language on page 87 of the Brief about why audits did not occur in 2012.

Stenger agrees that he will not dispute or object to the facts set forth in the remainder of the Brief and agrees not to put forth evidence or argument contrary to the facts in the sections of the Brief the government will not seek to include in the PSR. The parties agree that any additional facts necessary to the Court’s calculation of the advisory guideline range or assessment of Section

3553(a) sentencing factors can be supplied to the Probation Office in the normal course of the presentence investigation process.

In light of this resolution, in lieu of a government filing regarding sentencing guidelines issues, the government and the defense will meet with the Probation Officer to discuss the advisory sentencing guidelines as part of the presentence investigation process.

Dated at Burlington, in the District of Vermont, this 4th day of October, 2021.

Respectfully submitted,

UNITED STATES OF AMERICA

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